



A COMPLAINT UNDER THE CIVIL RIGHTS ACT,
42 U.S.C. § 1983

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

SCANNED at LSP and Emailed
7/2/12 by CM 17 pages
date initials No.

CONNER RAY BROWN
Plaintiff

592088
Inmate Number

VERSUS

Caddo parish
Sheriff Department
Emergency Response
Team

RECEIVED

JUL 02 2012

Legal Programs Department

(Enter above the full name of each
defendant in this action.)

Electronic Filing Pilot Program

In accordance with the Procedural Rules for Electronic Filing Pilot Project, General Order 2011, inmates who reside in or are transferred into Louisiana Department of Corrections facilities participating in the Electronic Filing Pilot Program shall receive orders, notices and judgments by Notice of Electronic Filing ("NEF").

Instructions for Filing Complaint by Prisoners
Under the Civil Rights Act, 42 U.S.C. § 1983.

The names of all parties must be listed in the caption and in part III of the complaint exactly the same.

In order for this complaint to be filed, it must be accompanied by the filing fee of \$350.00. In addition, the United States Marshal will require you to pay the cost of serving the complaint on each of the defendants.

If you are unable to pre-pay the filing fee and service costs, you may petition the court to proceed in forma pauperis. You must sign the affidavit, and obtain the signature of an authorized officer certifying the amount of money in your inmate account. If pauper status is granted, you will be required to pay an initial partial filing fee and thereafter, prison officials shall be ordered to forward monthly payments from your inmate account until the entire filing fee is paid.

You will note that you are required to give facts. THIS COMPLAINT SHOULD NOT CONTAIN LEGAL ARGUMENTS OR CITATIONS. ALSO, DO NOT INCLUDE EXHIBITS.

Submit the complaint and pauper affidavit to the Clerk of the United States District Court for the Middle District of Louisiana, 777 Florida Street, Suite 139, Baton Rouge, La. 70801-1712.

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No (☒)

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiff(s): _____

Defendant(s): _____

2. Court (if federal court, name the district; if state court, name the parish):

3. Docket number: _____

4. Name of judge to whom case was assigned: _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?):

6. Date of filing lawsuit: _____

7. Date of disposition: _____

C. Have you had any previously filed federal lawsuits or appeals, whether or not related to the issues raised in this complaint, dismissed by any federal court as frivolous, malicious, or for failure to state a claim for which relief can be granted?

Yes () No (☒)

If your answer is yes, list the civil action numbers and the disposition of each case. You must identify in which federal district or appellate court the action was brought.

II. Place of present confinement: _____

A. Is there a prisoner grievance procedure in this institution?

Yes (☒) No ()

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes () No () "THE INCIDENT TOOK PLACE IN CALDO PARISH."
IN WHICH THE "ARP" WERE FILED.

C. If your answer is Yes:

1. Identify the administrative grievance procedure number(s) in which the claims raised in this complaint were addressed. _____

2. What steps did you take? _____

3. What was the result? I NEVER RECEIVED AN ANSWER.

D. If your answer is No, explain why not: _____

III. Parties

(In Item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff(s) CONNER RAY BROWN
Address LOUISIANA STATE PENITENTIARY

In Item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of any additional defendants.

B. Defendant Caddo Parish Sheriff Department employed as Emergency Response Team at Caddo Correctional Center

C. Additional Defendants: _____

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. **Do not given any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I have attached all documents, AND papers describing all the above.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite

no cases or statutes. Attach no exhibits. I WANT the courts to grant
Me, direct damages, compensatory damages, treble damages
Remedy Relief!

VI. Plaintiff's Declaration

1. I understand that I am prohibited from bringing a civil action in forma pauperis if, while I was incarcerated or detained in any facility, I have brought three or more civil actions or appeals in a court of the United States that were dismissed on the grounds that they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am in imminent danger of serious physical injury.

2. I understand that even if I am allowed to proceed in forma pauperis, I am responsible for paying the entire filing fee and any costs assessed by the Court, which, after payment of the partial initial filing fee, shall be deducted from my inmate account by my custodian in installment payments as prescribed by law.

3. I understand that if I am released or transferred, it is my responsibility to keep the Court informed of my whereabouts and failure to do so may result in this action being dismissed with prejudice.

4. I consent to receive orders, notices and judgments by Notice of Electronic Filing.

Signed this _____ day of JUNE 10th, 2012.

Conner Ray Brown

Signature of plaintiff(s)

ON November 28, 2010 I WAS INCARCERATED AT Caddo Correctional Center. At Approx: 5:30 AM ON the WAY to breakfast, the deputy gave us instruction, there was NO talking Allowed, ON the way going Nor coming. ON the way back to our Cell, two of the inmates that were IN the Cell with me they began playing around AND one of them fell, AND bumped his head, AND I smiled, I heard the deputy tell them to come there! I WALKED into my Cell. About two minute later the deputy began clicking the Cell door. I open the door, the deputy told me to Come down to the deputy panel, so I walked down to the panel. he told me to get ready for lock down, I ASKED him Why? I said, I have Not did Nothing wrong. I obeyed your instruction. I did Not talk or say Anything. his response, WAS, I am going to lock down the whole Cell. the two inmates, which he Saw playing around, they were standing there AND telling him that if he lock them down, he had to lock me down to. While I am standing there explaining to him, I said, Nothing, he remotely open the two sliding doors, UNaware that he had Called a signal. ONCE he calls a signal, it signal, what is Called the emergency response team. When they come running inside the dorm there is a procedure you have to do. It is, you must get down ON the floor, with both hands behind your back, face down. I got down ON the floor with both hands behind my back, AS they was running in, the deputy pointed At me, while I am down ON the floor, one of them dived into my back, dragging me About four to five feet across the floor! he began to elbowing me in my back constantly. After they put this bar with the handcuffs ON it. With my hands behind my back They grabbed the bar AND began to drag me out the dorm. They tried to make me stand up, but I could Not! Stand up. they dragged me into the hallway AND they began to hit me in my chest At least five time. //At that point, I thought I WAS dead! I realize

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that I wasn't, when I saw the grey tile floor. After that horrible, felonious Aggravating Assault, from that Vicious Attack! that left me paralyzed AND UNABLE to Urinate on my OWNED, I don't have a regular bowel Movement, I CAN'T WALK or STAND up. I am paralyzed from waste down, My entire body is Num AND full of Aggravating pain! I have had this Catheter inserted in me, every since this physical cruelty, it is clearly, obvious that this is A serious offense, Caddo parish Sheriff department At Caddo Correctional Center, committed. I am confined to a Wheel Chair, I am due for surgery At ANY time on my back AND SPINAL cord. I have been seen by doctors AND physicians. I also have severe Nerve damages! there is Absolutely No doubt, is A QUARIS OFFENSE AND Criminal Negligence. After this felonious Assault, Now understanding Why, Ms. Mary harried, My court appointed Attorney, refused to turn over the pictures, AND demonstration to Mr. Joseph Bailey. First of All, Ms. harried, is AN employee for Caddo parish, She was instructed Not to release those evidence to Mr. Bailey. AND even if, She did, We learned later, that Mr. Bailey was AN formal employee for Caddo parish AS well. Mr. Bailey began having Conversation AND visits with my family AND I, After Mr. Bailey had gether enough information About our intelligents of the law. he was well aware of this felonious Assault before we hired him. With Caddo parish Sheriff department At fault of this Vicious Offence. My trial procedural was held At Caddo parish Court house. With Mr. Bailey informing Caddo parish Committee, Assuming AND convinced that we were totally ignorant of the law. AND with them having Actual knowlege that this is A Consolidating or Class Action law suit, AND would fined me with A lesser charge, such AS, justified, ACCIDENTAL, or Negligence. IN which his deceptfulness lead us to believe that these was the grounds would be our defense.

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Mr. Bailey AND Caddo parish committee, arranged a private conference including the prosecuting Attorney. Mr. Bailey saw a opportunity of a profitable advantage where he could receive a profit on his defense obligation as well as the offense. With him being a member of Caddo parish Committee, AND with him having NO complete Medical report on my condition AND injuries AND damages. being influenced, he arranged AN organize a false agreement. they plan was, first, to arrange a false procedural default, AND a false misrepresentation AND, by NOT allowing the first A.R.P. Complaint form to be exposed, that was filed AND signed, when this vicious assault first occurred. Mr. Bailey assignment AND default agreement was to, continue to mislead, lie AND deceive my family AND I through AND doing this misfeasance tainted trial, by allowing the prosecution to mislead the jury by allowing his expert witness to lie under oath, this infire trial was well organized AND tainted. Mr. Bailey did NOT subpoena ANY of my witness AND did NOT allow the witness that was present to come forth to testify in my behalf. he failed to submit the clear AND convincing evidence, the best evidence. they racketeering agreement, was to make sure, he allow the prosecution to have complete control of the courtroom, by NOT submitting, sufficient evidence AND the genuine issue of material facts. he pretended AS if he were defending me by acting AS if he were my defense attorney doing the false trial proceeding under oath. watching this corrupty attorney, bargaining, deceit AND unlawfull transaction, knowing that he was instructed NOT to allow NO evidence of the law suit that was filed, AND did NOT allow NO witness to appear or testify. I had nothing to present to the jury that would convince them of my innocence. Absolutely. Nothing. Null Null he intentionally, deliberately

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did not defend me, his ineffective Assistance
 of Counsel, is Absolutely Complete Failure! Mr. Bailey
 And Caddo parish Committee, And they organize
 organization, deprived me of my Constitutional rights
 this is extrinsic fraud, fraud on the Court, actual
 fraud And obstruction of justice! All of this UNjustice
 UNlawfull, racketeering corrupt AND defilement. I realize
 that I was fighting Against A whole parish Committe
 e, And with A defiled AND bad faith Attorney with
 out, Absolutely NO defense, Nothing to present or smit
 to the jury, they put My life in jeopardy, there
 WAS NO other choice but to find me guilty.
 they thought AND Assumed with Mr. Bailey informing them
 that we were totally ignorant of the law, And had NO
 idea how the judicial System operate. with Mr. Bailey CON
 Spiring, they Assumed that they would Avoid the law suit
 by Mr. Bailey Not filing the Complaint Against Caddo
 parish Sheriff department, by Allowing the statue of limation
 to run out, in which he had enough time to do so
 I Need Not go ANY further, I think I have explar
 ined, enough for you to Understand All of the hurt
 the suffering, Aggraney, pain, Aggravating, Mental distress,
 physical distress, AND Mental Anguish and deceit! All of
 this UNjustice, UNfairness, UNlawfull, AND UNfaithfull.
 I AM ASKING the Courts to examine this Wrongfull
 decision, AND Carefully Understand what I have been
 through, the trauma, the trial, the Sentence, I AM sure
 there is Not A Court in the United States, would
 Not GRANT A Motion for A Review, Reversal, reexamine
 Remit, New trial I AM ASKING, Respectfully the
 Courts for AN direct Appeal AND A change of
 Venue. I AM seeking damages, direct damages
 Compensatory damages, treble damages.